

RECEIVED

2005 AUG 22 P 12:47

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA
DEBRA L. HOOVER
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA
VS.

*
*
*
*
*

Case No. 2:05-cr-139-A

CORY REED

MOTION TO REINSTATE DEFENDANT UPON PRETRIAL SUPERVISION

COMES NOW the defendant, CORY REED, and moves this Honorable Court to reinstate him upon bail, and as grounds therefor shows as follows:

1. That the defendant has abided by all conditions of his pretrial supervision and passed all drug screens since his release upon bail about a month ago. In fact he submitted to a urine screen on the day before he was ordered to surrender back into the custody of the U.S. Marshal.


2. Defendant has maintained suitable employment in the construction industry, B&B Construction Company of Montgomery. He has been steadily working there since his release and is doing well. Defendant has attached copies of the two paycheck stubs he has received from B & B Construction Co. He will be receiving another couple of checks for work done but not yet paid.

3. The defendant has followed the instruction of this Honorable Court in that he surrendered himself to the U.S. Marshal's custody as ordered (doc. #32) by the Court on the date required, to-wit: Noon, Friday, August 19, 2005.

3. Defendant submits that his performance thus far on bail has demonstrated that he can be trusted not to flee, and his performance in abiding by all requirements demonstrates that he does not pose a danger to the community pending trial in this case. In fact he has

demonstrated that the Court can trust him without the necessity of his wearing a leg monitor.

WHEREFORE, defendant prays this Honorable Court to set this matter for hearing and thereafter enter an order permitting the defendant to be reinstated upon pretrial supervision under whatever conditions the Court may deem fit and proper in the premises.


BARRY E. TEAGUE, [TEA003]
ATTORNEY FOR DEFENDANT

ADDRESS OF COUNSEL:

Barry Teague, Esq.
138 Adams Avenue
Post Office Box 586
Montgomery, AL 36101
(334) 834-4500; FAX 834-4501
email: *beteague36@aol.com*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been served upon the United States Attorney and any other counsel of record by placing same in the U.S. Mail, postage prepaid and addressed as shown below, this 22nd day of August, 2005.

Hon. Todd A. Brown
Assistant U.S. Attorney
Post Office Box 197
Montgomery, AL 36101


BARRY E. TEAGUE

B & B CONSTRUCTION CO.
P.O. BOX 4419
MONTGOMERY, AL. 36104-4419

EMPLOYEE
 0283 REED, CORY

PAY RATE
 12.00

PAY DATE
 08/05/05

EARNINGS
 REG. 40.00

AMOUNT
 480.00

YTD
 480.00

DEDUCTIONS
 FEDERAL W/H
 FICA
 AL STATE W/H
 MEDICARE

AMOUNT
 51.13
 18.04
 26.09
 15.17

YTD
 51.13
 18.04
 26.09
 15.17

GROSS EARNINGS:
NET EARNINGS:

480.00
 369.57

TOTAL DEDUCT: 110.43

110.43

B & B CONSTRUCTION CO.
P.O. BOX 4419
MONTGOMERY, AL. 36104-4419

EMPLOYEE
 0283 REED, CORY

PAY RATE
 12.00

PAY DATE
 08/12/05

EARNINGS
 REG. 40.00

AMOUNT
 480.00

YTD
 960.00

DEDUCTIONS
 FEDERAL W/H
 FICA
 AL STATE W/H
 MEDICARE

AMOUNT
 51.13
 18.04
 26.09
 15.17

YTD
 102.26
 36.08
 52.18
 30.34

GROSS EARNINGS:
NET EARNINGS:

480.00
 369.57

TOTAL DEDUCT: 110.43

220.86